

# CTI

COMMERCIAL TRANSPORTATION INC.

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53746

ORIGINAL

April 7, 1999

**DOCKET CLERK, U.S. DOT DOCKETS  
ROOM PL - 401  
400 SEVENTH STREET S.W.  
WASHINGTON, DC 20590  
DOCKET NO. 98-3656**

FHWA-98-3656-19

DEPT. OF TRANSPORTATION  
FEDERAL HIGHWAY ADMINISTRATION  
98 APR 13 AM 11:40

To Whom it May Concern,

I represent a motor carrier that operates both company owned and inter-modal equipment. My operation is primarily in the Mid-Atlantic region and the inter-modal operation services steamship lines at the ports of New York, Philadelphia PA, Baltimore MD & Norfolk VA.

In 1998, C.T.I. had 126 inspections, 53 of which were performed on C.T.I.'s company owned equipment and 73 on inter-modal equipment. The out of service rate was 23% for my company equipment and 40% for the intermodal equipment.

Of the 40% out of service from my inter-modal operation, 76% was the #2 vehicle, the container chassis. Since this equipment isn't owned by C.T.I., I have no control over the maintenance of these chassis. I feel it's somewhat unfair to hold the motor carrier responsible for the maintenance of equipment it doesn't own and may have it in its possession for 1 day.

I have enclosed, for your review, a detailed breakdown of my findings, including the inspection report numbers, the state where the inspections took place & the date of each inspection.

I hope you find this information useful and I look forward to help make our highways safer.

Sincerely,



Anthony N. Coppola  
Vice President

## **In response to the specific questions.**

1. 40% Out of service (*Intermodal chassis*)
  - 90% Out of service orders are issued within 24 hours of picking up the container.
2. Average 2 violations per inspection on chassis.
3. The UIIA is controlled by the owners/providers of the inter-modal equipment.
4. N/A
5. The same way they hold the carrier responsible for the equipment even if the carrier picked-up the equipment damaged.
6. The provider should warrant the equipment for at least 5 days.
7. Nothing prevents the driver from walking around a container or trailer.
  - Drivers would have to be trained in the operation & maintenance of the trailer electrical system, breaking system, suspension system and tires (including how to spot a defective re-cap), then the driver would need a full set of tools to repair the equipment. Absolutely not possible.
8. Not relevant to safety.
9. 100% of the time. The motor carrier has no first hand knowledge of whether the FHWA inspection was made.
10. Information not available.
11. Information not available.
12. Information not available.
13. The problem is that no one is checking to see if the current inspections are being made, let alone increasing the number of inspections.
14. N/A

TERMINAL:		NEWARK				
INSPECTION DATE	INSP LEVEL	DRIVER'S NAME	INSPECTION NUMBER & STATE IN WHICH INSPECTED	O/S YES/NO	NO. 2	INDICATE TRAILER OR CONTAINER T - OR - C
12/6/97	2	Agui, Rolando	NY19001265 NY	No	X	C
12/17/97	3	Doyle, John D	384860 NJ	No		C
12/15/97	2	Rivas, Moises		No	No	C
1/8/98	1	Best Jr, Thomas	377436 NJ	Yes		C
1/3/98	1	Garay, Roberto A	385413 NJ	No		C
2/18/98	2	Estrada, Elmer E	CTI4002960 CT	No	No	C
3/2/98	2	Gachette, Lambert	398135 NJ	No	No	C
3/12/98	3	Caicedo, Diego F	NY55000136 NY	No		C
3/5/98	2	Yambo, David	398121 NJ	No	X	C
3/16/98	3	Yambo, David	880736 MD	No		C
3/16/98	2	Zacarias, Carlos	PADZ000479 PA	Yes	X	C
3/25/98	1	Yambo, David	417404 PA	Yes	X	C
3/27/98	1	Agui, Rolando	NYAD000944 NY	Yes	X	C
4/7/98	1	Cordova, Hever C	377350 PA	No	No	C
5/4/98	1	Caicedo, Diego F	NY14000920 NY	No	X	C
5/21/98	2	Horsley, Terry M	393123 PA	Yes	X	C
5/20/98	1	Agui, Rolando	NY13000859 NY	No		C
6/17/98	1	Figueroa, Angel L	MARR000478	No	X	C

6/24/98	2	Torres, Arbey A	NYAD001121 NY	No	No	C
12/22/62	1	Infante, Flor	NY11001191 NY	Yes	x	c
7/13/98	1	Estrada, Luis	CT52001 040 CT	Yes	X	C
7/22/98	1	Abasto, Eduardo M	285583 PA	Yes	X	C
7/29/98	3	Caicedo, Diego F	413483 NJ	No	X	C
8/3/98	3	Gachette, Lambert	406474 NJ	No	No	C
8/27/98	3	Torres, Jose	413974 NJ	No		C
9/8/98	2	Pineda, Edwin G	415978 NJ	No	No	C
9115198	1	Barnes, Willie	NYB0000203	Yes	x	C
9/15/98	3	Gutierrez, Eduardo J	414491 NJ	No		C
9/30/98	1	Caicedo, Diego F	NY28000848	No		C
10/1/98	2	Rivas, Moises	396067 PA	No	No	C
10/20/98	3	Inscore, Johnny L	917581 MD	No	No	C
1014198	3	Torres, Jose A	424545 NJ	No	No	C
10/14/98	2	Yambo, David	416409 PA	Yes	X	C
10123198	1	Infate, Flor	NYAM001019 NY	Yes	X	C
10/29/98	1	Caicedo, Diego F	PAPQ000034 PA	No	X	C
11/6/98	3	Agui, Rolando	363128 VA	No		C
11/17/97	2	Hercules, Thaddeus	NY21001217 NY	No	No	C
11/19/98	1	Gachette, Lambert	NY18001592 NY	No	X	C
11/20/98	3	Estrada, Elmer E	NYBE000482 NY	No		C
28		#1 & #2 inspections		11		

note: out of 28 inspections, 11 were placed out of service						
8 were on the #2 vehicle. this represents 73% of the total placed out of service						

TERMINAL:		NORFOLK				
INSPECTION DATE	INSP LEVEL	DRIVER'S NAME	INSPECTION NUMBER & STATE IN WHICH INSPECTED	o/s YES/NO	NO. 2	INDICATE TRAILER OR CONTAINER T - OR - C
12115197	2	Kanjelkheir, Nabil	390005 NJ	No	X	C
1/7/98	1	Ali, Jermaine Y	377435 NJ	Yes	X	C
1/13/98	2	Ali, Jermaine Y	VABI000314 VA	Yes	X	C
3/5/98	2	Eley, Troy	395964 NJ	No	X	C
3/5/98	1	Keffer, Eric Neal	692006 MD	Yes	X	C
3/23/98	1	Miles, John D	VAAE000344 VA	Yes	X	C
3/27/98	1	Maheer, Barey Lee	692624 MD	No	No	C
4/29/98	2	Ali, Jermaine Y	VABA000706 VA	Yes	X	C
5/7/98	1	Miles, John D	MDBQ000309 MD	Yes	x	C
5/27/98	2	Eley, Troy	VABA000768 VA	No	X	C
6/10/98	2	Ali, Jermaine Y	370629 VA	Yes	X	C
7/10/98	2	Ali, Jermaine Y	409262 NJ	No	X	C
8/6/98	2	Franklin, Rodney A	VABB000614 VA	No		C
8/25/98	1	Best Jr, Thomas	VABD001211 VA	Yes	X	C
10/6/98	2	Lee, George A	VABG001077 VA	No		C
10/28/98	2	Best Jr, Thomas	DERB000667 DE	No		C
11/10/97	3	Best Jr, Thomas	MDBM000205 MD	Yes		C
11/16/98	2	Keffer, Eric Neal	TNAR005954 TN	Yes		c

18		#1 & #2 inspections ,		i	10	
note: out of 18 inspections, 10 were placed out of service						
10 were on the #2 vehicle. this represents 100% of the total placed out of service						

TERMINAL:		BALTIMORE				
INSPECTION DATE	INSP LEVEL	DRIVER'S NAME	INSPECTION NUMBER & STATE IN WHICH INSP	O/S YES/NO	NO. 2	INDICATE TRAILER OR CONTAINER T - O R - C
12/1/97	3	Stanley, Gregg S	889149 MD	No	No	C
12/4/97	2	Wiggins, Allen C	381321 NJ	No	x	c
1/18/98	2	Harrison Sr, Jerry A	392085 NJ	No		C
11/21/98	3	Jackson, Ronald E	875507 MD	No	No	C
2/20/98	1	Evans Sr, Billy W	291628 PA	No	X	C
3/5/98	1	Rodriguez, Jose	VAAH000950 VA	Yes	X	C
3/19/98	2	Groves, Randy W	882315 MD	No	X	C
3/11/98	2	Melhorn, Gordon D	343699 PA	No	X	C
3/27/98	2	Tyrell, Lyndol G	400209 NJ	No	X	C
4/13/98	2	Melhorn, Gordon D	PADS0001 04	Yes		C
5/22/98	2	Petrecca, Fred D	439722 PA	No	X	C
5/29/98	2	Wiggins, Allen C	MDBB000935 MD	No	No	C
6/17/98	1	Rodriguez, Jose	908767 MD	No	X	C
7/17/98	1	Petrecca, Fred D	MDBJ000341 MD	No	X	C
8/11/98	1	Stanley, Gregg S	964327 MD	No	X	C
8/19/98	2	Rodriguez, Jose	924246 MD	No		C
8/21/98	2	Poffenberger, John J	936523 MD	No		C
8/24/98	2	Rodriauez, Jose	391338 VA	Yes		C

8/27/98	2	Wiggins, Allen C	DEDH888105 DE	Yes	X	C
9/10/98	1	Ali, Jermaine	332979 VA	Yes		C
9/21/98	1	Franklin, Rodney A	VABB000697 VA	Yes	X	C
10/6/98	1	Wiaains. Allen C	MDEB000467 MD	No	X	C
10/15/98	2	Stanley, Gregg S	919232 MD	No	No	C
10/14/98	1	Groves, Randv W	910335 MD	No	X	C
10/22/98	2	Poffenberger, John J	917619 MD	No		C
10/24/98	3	Wiaains. Allen C	425042 NJ	No		C
10/27/98	1	Wiggins, Allen C	918007 MD	Yes		C
1113198	2	Stanley, Gregg S	938994 MD	No		C
11/24/98	1	Harrison Sr, Jerry A	PAK4000262 PA	Yes	X	C
11/25/98	1	Jackson, Ronald E	390530 PA	No		C
27		#1 & 2 inspections		8		
note: out of 27 inspections, 8 were placed out of service						
4 were on the #2 vehicle, this represents 50% of the total placed out of service						